

NOTICE OF AMENDMENT

CERTIFIED - RETURN RECEIPT REQUESTED

March 25, 1998

Mr. Theo van Besouw
Director, Engineering & Operations
Tuscarora Gas Transmission Company
1575 Delucchi Lane
Suite 225
Reno, Nevada 89520-3057

CPF No. 58103-M

Dear Mr. van Besouw:

On November 3-7, 1997, representatives of the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Tuscarora Gas Transmission Company's (TGTC) Oregon and California facilities, operation and maintenance manual, and records at Reno, Nevada.

As a result of the inspection, it appears that you have committed probable violations of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and probable violations are as follows:

1. **§192.605 Each operator shall include the following in its operating and maintenance plan:**

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

**§192.479 Atmospheric Corrosion Control, General;
(a) pipelines installed after July 31, 1971.**

Each above ground pipeline or portion of a pipeline installed after July 31, 1971 that is exposed to the atmosphere must be cleaned and either coated or jacketed with a material suitable for the prevention of atmospheric corrosion. An operator need not comply with this paragraph, if the operator can demonstrate by test, investigation, or experience in the area of application, that a corrosive atmosphere does not exist.

At the time of inspection, TGTC's operation manual did not have specific atmospheric corrosion control procedures that comply with §192.605 (b)(2).1

Tuscarora must develop procedures to address atmospheric corrosion. These procedures must, but not limited to, include the following:

1. Determining the areas of atmospheric corrosion
 2. Control of atmospheric corrosion
2. **§192.605 Each operator shall include the following in its operating and maintenance plan:**

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(b)(8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found.

At the time of inspection, TGTC did not have procedures that provide compliance with 192.605(b)(8) in its entirety.

TGTC's procedures for Maintenance and Normal Operations did not include specific procedures for periodically reviewing the work done by operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action when deficiencies are found. Each operator must establish a

procedures which will provide operating and maintenance personnel with a basic understanding of, and the necessary skills to carry out, each element of the operating and maintenance plan appropriate to the job assignment. The effectiveness of these procedures must be monitored and evaluated on a continuing basis utilizing methods which may include written tests, oral tests, field audits, performance reviews, simulation exercises, follow-up critiques or other means.

3. §192.605 Each operator shall include the following in its operating and maintenance plan:

§192.615 Emergency Plans;(a) each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

- (3) Prompt and effective response to a notice of each type of emergency, including the following;**
- (i) Gas detected inside or near a building.**

At the time of inspection, TGTC's emergency plan did not have a procedure for gas detection inside or near a building.

Written procedures should state the purpose and objectives of the emergency plan and provide the basis for instructions to appropriate personnel. The objective of the plan should be to assure that personnel who could be involved in an emergency are prepared to recognize and deal with the situation in an expeditious and safe manner. To assure the safety of the general public they provide for the prompt and effective response to gas detected inside or near a building.

Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violations persist up to a maximum of \$500,000 for any related series of violations.

As provided in 49 C.F.R. §190.237, this notice serves as your notification that this office considers your procedures/plans inadequate regarding items 1, 2, and 3. Under 49 C.F.R. §190.237, you have a right to submit written comments or request

an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. § 190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice. Please forward correspondence to the Director, Research and Special Programs Administration, Western Region, Office of Pipeline Safety, 12600 West Colfax Avenue, Suite A-250, Lakewood, Colorado 80215. Please refer to **CPF. No. 58103-M** on any correspondence or communication in this matter.

Sincerely,

Edward J. Ondak
Director

Enclosure

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